

October 30, 2018
B-09075-0159-2533
REPA5-2533-017

Mr. Tom Matheson
Contract Level Task Order Contracting Officer Representative
U.S. EPA Region 5
77 West Jackson Blvd. (LP-7J)
Chicago, IL 60604

Subject: EPA Contract No. EP-W-12-031, Task Order 5533, Corrective Action Support for GE Evendale, Task 04. Technical Review of the Corrective Measures Study Report and Updated CA750 Environmental Indicator Documentation for GE Aviation Facility, Evendale, Ohio

Dear Mr. Matheson:

In response to Task Order 5533 under EPA Contract No. EP-W-12-031, Task 04, Booz Allen Hamilton (Booz Allen) has conducted a technical review of the June 2017 Corrective Measures Study Report (CMS) for the General Electric (GE) Aviation facility in Evendale, Ohio. The CMS outlines GE's recommended corrective measures for contamination in soil vapor, soil, and groundwater. At EPA's request, our review focused primarily on the development and conclusions for contaminated groundwater, including modeling results presented in Appendix C to the CMS (although critical issues pertaining to other topics were also evaluated). At EPA's request, Booz Allen has also reviewed CA750 Environmental Indicator (EI) documentation for the site, which was updated and resubmitted to EPA on September 6, 2017.

Technical comments generated during this review are provided in the enclosed deliverable. The most salient comments in the deliverable are as follows:

- The CMS discusses groundwater contamination as a comingled chlorinated volatile organic compounds (CVOC) plume, rather than evaluating individual constituents. This generalized approach to contaminant delineation/evaluation is not acceptable. The CMS must be expanded to document the extent of contaminant plumes for each of the seven key CVOCs in the three groundwater zones.

- The CMS must identify any additional secondary contaminants that are present above applicable screening criteria. The location of those exceedances (within or outside of the footprint of key contaminant plumes) should be clarified, and the CMS should provide justification to explain why it is not necessary to develop concentration-based corrective measures objectives for those parameters to ensure protection of human health and the environment.
- The CMS must adequately address groundwater exceedances *already beyond* the site boundary.
- The CMS must demonstrate that the groundwater pump and treat IRM has been successful in reducing CVOC mass in the subsurface and CVOC concentrations in extracted groundwater. The CMS must also provide evidence that natural attenuation is occurring and likely to continue (without augmentation) until CVOC concentrations have declined to acceptable levels.
- The updated EI is based on conclusions presented in the CMS, many of which require additional justification and/or clarification as discussed in the deliverable. Until those issues are addressed, we do not believe that a positive EI determination regarding stabilization of groundwater is achievable for this site.

These and other technical comments on the CMS and CA750 are discussed in more detail in the enclosure.

If you have any questions regarding this deliverable, please contact me at (847) 452-5934 or Michele Benchouk at (215) 393-1233.

Sincerely,



Frances B. Hodge
Task Order Manager

BOOZ ALLEN HAMILTON

Enclosure

cc: Todd Gmitro, EPA Technical Representative